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March 5, 2008

Via Fax: 914-390-4179

Hon. Stephen C. Robinson  
United States District Judge  
United States District Court  
300 Quarropas Street  
White Plains, NY

**MEMO ENDORSED**

**RE: DAVID AND SHARON BELL V. CHRISTIAN I. FREJI**  
**VENUE : United States District Court**  
**DOL : 11/30/07**  
**INDEX NO. : 07 CV 11611 (SCR)**

Hon. Sir:

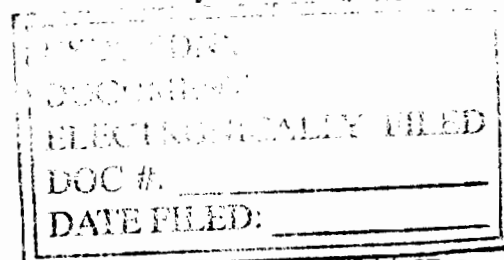
Our firm is attorney for the defendant Christian Freji in connection with the captioned matter. This action arises out of an accident that occurred on November 30, 2007 when a motor vehicle operated by Mr. Freji struck the motor vehicle operated by plaintiff David Bell in which his wife Sharon was a passenger.

A passenger in Mr. Freji's car was rendered a quadriplegic as a result of the accident.

Allstate Insurance Company is the insurance company for Mr. Freji and the Allstate Policy provides coverage for this accident in the amount of \$250,000.00/\$500,000.00.

Allstate has already allocated \$250,000.00 of that amount to the injuries sustained by Mr. Freji's passenger. At this time while she is represented by an attorney, an Action has not yet been instituted.

In my conversations with Mr. Vilenski, counsel for plaintiffs in this action, he has advised me that David Bell sustained very serious personal injuries and was hospitalized from the date of accident including rehabilitation until sometime in February of 2008. Mrs. Bell's injuries, while not as serious, were also substantial.



Mr. Vilenski, counsel for plaintiffs, and I have agreed that if the Court approves, to hold all discovery in abeyance pending a receipt of the medical records with respect to the Bells' injuries in an effort to resolve this matter within the policy limits afforded Mr. Freji.

Accordingly, with Mr. Vilenski's consent, it is hereby requested that the Court extend the time within which to submit a Scheduling Order for 90 days from the date hereof.

Thank you for your consideration.

Very truly yours,

*William D. Gallagher*  
William D. Gallagher

WDG/tj

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APPLICATION GRANTED

*Stephen C Robinson* 3/7/08  
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HONORABLE STEPHEN C. ROBINSON